

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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MICHELLE CARTER,

Plaintiff,

17-CV-539-AMD-SLT

-against-

JPMORGAN CHASE BANK, N.A.,

Defendant.

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JPMORGAN CHASE BANK, N.A.,

Third-Party Plaintiff,

-against-

DAHALEEL 1, INC., dba ROCKAWAY FARM  
DELI & GRILL, et al,

Third-Party Defendants.

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**THIRD PARTY DEFENDANTS  
DAHALEEL 1, INC. AND SALEM  
N. AL-GEMSH DEMAND A  
TRIAL BY JURY**

**ANSWER OF DAHALEEL 1, INC.  
AND SALEM N. AL-GEMSH TO  
CROSSCLAIMS OF MUKHTER  
OMAIRAT AND PICKLES &  
OLIVES, INC.**

Defendants **DAHALEEL 1, INC.** and **SALEM N. AL-GEMSH**, by their  
attorneys, **LAW OFFICE OF RAY BECKERMAN P.C.**, for their answer to the crossclaims of  
Mukhter Omairat and Pickles & Olives, Inc., allege:

1. Deny the allegations of paragraphs 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34,  
35, and 36.

**FIRST AFFIRMATIVE DEFENSE**

2. By unlawfully removing and retaining a portion of the funds in question, and

aiding and abetting the removal of the funds, without the knowledge or consent of Al-Gemsh, crossclaimants are responsible for their own damages, if any.


**SECOND AFFIRMATIVE DEFENSE**

3. By unlawfully converting funds in the bank account of Dahaleel 1, Inc., crossclaimants have been unjustly enriched, rather than damaged.

**WHEREFORE** it is respectfully requested that the Court grant judgment dismissing the crossclaims of Mukhter Omairat and Pickles & Olives, Inc., and for costs, disbursements, and such other and further relief as to the Court seems proper.

Dated: Forest Hills, New York  
February 16, 2018

**LAW OFFICE OF RAY BECKERMAN P.C.**

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